

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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**2005 SEP 28 A 11:47**

**U.S. DISTRICT COURT  
DISTRICT OF MASS.**

IRON MOUNTAIN INCORPORATED;	)	
et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
THOMAS CARR,	)	
	)	
Defendant	)	Civil Action No.
	)	
And	)	
	)	
THOMAS CARR,	)	05 10890 RCL
	)	
Counter-Plaintiff	)	
	)	
v.	)	
	)	
IRON MOUNTAIN INCORPORATED;	)	
et al.	)	
	)	
<u>Counter-Defendants</u>	)	

**DEFENDANT AND COUNTER-PLAINTIFF THOMAS CARR'S**

**MOTION FOR LEAVE TO FILE A CONSOLIDATED REPLY**

Thomas Carr ("Carr"), Defendant and Counter-Plaintiff in the above-captioned proceedings, pursuant to Local Rule 7.1(b)(3) and by and through undersigned counsel, hereby respectfully moves this Honorable Court for leave to file a Consolidated Reply to Plaintiffs' Opposition to Defendant's Motion to Disqualify Counsel and Plaintiffs' Opposition to Defendant's Motion to Strike Plaintiff Charles Moore's Affidavit and Argument Thereto.

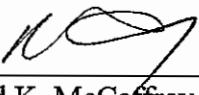
Currently pending before the Court is Defendant's Motion for Leave to File a Reply to Plaintiffs' Opposition to Carr's Motion to Disqualify Counsel. In light of the issues that are inextricably intertwined between the Opposition to the Motion to Disqualify and Plaintiffs' Opposition to Defendant's Motion to Strike Plaintiff Charles Moore's Affidavit and Argument Thereto, Defendant and Counter-Plaintiff Thomas Carr believes and respectfully urges that the interests of efficiency would be best served by filing a single consolidated reply which addresses both Oppositions simultaneously. The proposed Consolidated Reply is attached hereto as Exhibit A.

In addition, pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that they have conferred with counsel for the Plaintiffs who do not oppose this motion.

September 27, 2005

Respectfully submitted,

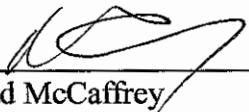
By his attorneys,

  
\_\_\_\_\_  
Read K. McCaffrey (pro hac vice)  
PATTON BOGGS, LLP  
2550 M Street, NW  
Washington, DC 20005  
(202) 457-5243  
[rmccaffrey@pattonboggs.com](mailto:rmccaffrey@pattonboggs.com)

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2005 true copies of Defendant and Counter-Plaintiff Thomas Carr's Motion For Leave To File A Consolidated Reply and Defendant And Counter-Plaintiff Thomas Carr's Consolidated Reply To Plaintiffs' Opposition To Carr's Motion To Disqualify and Plaintiffs' Opposition To Carr's Motion To Strike were served via Federal Express, to

Ira Gross  
Sullivan & Worcester LLP  
One Post Office Square  
Boston, MA 02109



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Read McCaffrey

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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et al. )  
Plaintiffs, )  
v. )  
THOMAS CARR, )  
Defendant )  
And ) Civil Action No.  
THOMAS CARR, ) 05 10890 RCL  
Counter-Plaintiff )  
v. )  
IRON MOUNTAIN INCORPORATED; )  
et al. )  
Counter-Defendants )

**ORDER**

Having considered and reviewed Defendant and Counter-Plaintiff Thomas Carr's Motion for Leave to File a Consolidated Reply to Plaintiffs' Opposition to Defendant's Motion to Disqualify Counsel and Plaintiffs' Opposition to Defendant's Motion to Strike, it is hereby

**ORDERED** this \_\_\_\_ day of \_\_\_\_\_, 2005:

Defendant and Counter-Plaintiff Thomas Carr's Motion is **GRANTED**.

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Judge, United States District Court